REMARKS/ARGUMENTS

Claims 1-21 are pending in the present application, prior to entry of this amendment. Of these claims, claims 1 and 9 are independent. Claims 1 and 9 have been amended to address the rejections. New claims 22-29 are presumed for entry.

Reconsideration of the rejection is respectfully requested in view of the foregoing amendments, and the following comments. Claims 1-21 were rejected under 35 U.S.C. § 102(b) as being anticipated by the *Seeley et al.* patent (6,069,655). The Examiner cited various portions of the *Seeley* patent in rejecting the claims. In view of the amendments to the claims, it is believed, and will be shown, that the claims as amended and as newly presented distinguish over the reference.

The *Seeley* patent is directed to an advanced video security system that monitors a premise to detect unwanted intrusions onto the premises. The system includes a plurality of cameras located about the premise that supply video images of scenes to a processor. The processor processes the images to detect motion in a scene and classify the source of the motion. If the source is determined to be one of a predetermined class of causes, there is an indication provided to an alarm unit of an intrusion.

As described in column 11, lines 36-47 of *Seeley*, video signals from the camera are provided as inputs into an image processor section 30 of the SCU (site control unit). Processor 30 looks sequentially at an image from each camera 22, and compares that image to a prior stored image from the same camera. The stored image is continually updated. The processor 28 incorporates certain algorithms from referenced co-pending applications to analyze the contents of the images represented by the signals to determine the presence of an intruder. Processor 30 includes a video masking section, a detection section, and an object recognition and labeling or classification section.

The *Seeley* patent therefore apparently utilizes a technique which may be characterized as "difference analysis" to detect a change in a video image that meets certain criteria to qualify the change as constituting an intrusion. As described in column 13, lines 45-54, the processing further involves identification of a class of detected cause of motion, for example, human,

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animal, or unknown, which for a given specific monitoring situation may result in generating an alarm.

It is readily apparent from these portions of the *Seeley* patent, and the general architecture and conceptual approach described therein, that this patent is directed to <u>image analysis for purposes of detecting intrusion</u>. There is no discussion or disclosure as to any position signals relating to any of the cameras. There is no discussion or disclosure of storage of any position signals as part of surveillance data. There is no discussion or disclosure of any position-controllable surveillance device that is responsive to a control signal for adjusting the position of the surveillance device, for example, for zooming in to a particular location within the monitored premises for a closer look. Indeed, there is no discussion or disclosure of any position-controllable surveillance devices *at all*.

The foregoing aspects of a surveillance system – missing from the *Seeley* patent but present in the claimed aspects of this application – are believed novel and should be patentable. Claim 1, as amended, provides a surveillance management system <u>for controlling at least one position-controllable surveillance device in response to processed surveillance data</u>. The claimed system includes a sensor system <u>including at least one position-controllable surveillance device.</u> The sensor system is configured to detect predetermined conditions and generate surveillance data in response thereto. The surveillance data includes <u>position data</u>. The processing system and command and control system are operative for retrieving predetermined <u>position data</u> in a surveillance database and <u>to generate a position control signal in accordance with said position data.</u> Finally, claim 1 further recites <u>a position-controllable surveillance device responsive to said control signal for adjusting the position of the surveillance device.</u> None of these aspects are disclosed, taught or suggested in *Seeley*.

Support for these amendments is provided in the application in various places. For example, page 9, starting at line 20, sensor units 250 and 260 may be supported by gimbals 453 and 463, with one gimbal provided for each camera. FIG. 4 shows such sensor units supported by gimbals, which those skilled in the art will understand are exemplary of position-controllable elements. Each gimbal is adjustable about two axes of rotation (X-axis and Y-axis), and is responsive to a control signal from a control device, e.g. gimbal controller 485. Also, as

described on page 10, beginning at line 22 and extending to page 11, the location of detected changes and movements is determined by sensors, for examples, by a laser distance detection system or triangulation techniques, and once the location of the change/movement has been determined, a telephoto camera 461 may be engaged to "zoom in" on the detected changes to obtain a closer view of the changes/movements at the determined location. Position data are described on page 10, lines 1-5 as, for example, data representative of the position (x, y, and z) of an area/object represented by pixel data (i.e. image data captured from cameras).

Accordingly, it is respectfully submitted that claim 1, as amended, is novel and non-obvious over the *Seeley* patent, as the *Seeley* patent completely fails to provide any disclosure, teaching, or suggestion of utilization of position signals obtained from surveillance devices, storing position data, generating a position control signal, and then adjusting the position of a surveillance device in accordance with the control signal.

Claim 9 presents similar subject matter as claim 1, except in the context of receiving surveillance data from sensors and providing position a control signal <u>usable by a position-controllable surveillance device</u>. The intent of the claim is that the claimed surveillance control system may stand alone as an invention and not need include sensors or positionable cameras or sensors the like as a part of the claimed combination of elements. Claim 9 has been amended to recite that the surveillance database stores surveillance data <u>including position data</u>, that the surveillance server receives surveillance data <u>including said position data</u> from a surveillance sensor unit, and that the surveillance server generates <u>a position control signal for utilization by a position-controllable surveillance device</u>.

Claim 9 is therefore and similarly believed novel, non-obvious, and patentable in view of the *Seeley et al.* reference.

New independent claim 22 is presented for entry. This claim is directed to a somewhat different aspect of a surveillance management system than claims 1 or 9. Claim 22 recites a surveillance management system <u>for managing a three-dimensional model of an area under surveillance by one or more surveillance devices that provides surveillance data</u>. As described on page 5 of the specification, a surveillance server may be configured to generate and display a

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three-dimensional model of an area under monitor, based upon the data stored in database 220. This model can then be used to analyze detected conditions within the monitored area.

Claim 22 recites a sensor system including one or more surveillance devices. The sensor system is configured to detect predetermined conditions and to generate surveillance data, said surveillance data including position data. A processing system is configured to receive said surveillance data and incorporate said surveillance data into a surveillance database. Finally, a command and control system is provided, operative to retrieve predetermined surveillance data from the surveillance database and to generate a three-dimensional data model of an area under surveillance in accordance with said position data.

These aspects of the present invention are described supported in the specification at various locations, for example on page 3 beginning at lines 23-28; page 5, lines 26-29; and page 10, lines 1-5. Such aspects are clearly not disclosed, taught, or suggested in *Seeley et al.*, as that patent is clearly concerned with image analysis based on differences between a stored video image and an incoming video image, and shows no appreciation whatsoever for the three-dimensional aspects of a monitored premise and using position signals to construct and utilize such a three-dimensional model. Claim 22 is therefore novel and should be patentable.

CONCLUSION

For the foregoing reasons, it is respectfully submitted that claims 1 and 9, as amended, and new claim 22, are novel and non-obvious in view of the *Seeley et al.* reference and should be allowable. The foregoing is presented as a full and complete response to the Office Action mailed December 24, 2003, and is believed to have placed all claims in condition for allowance. Such action is courteously solicited. If any issues remain that can be resolved by telephone, the Examiner is respectfully requested to contact the undersigned at 404-233-7000.
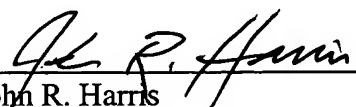
Applicant submits this Amendment and Response to First Office Action with a Request for a two month Extension of Time in which to file. PTO-2038 Credit Card Payment Form is enclosed authorizing payment in the amount of $282 for the eight (8) additional claims ($72) and two-month extension of time petition fee ($210). Applicant respectfully requests that the Patent Office notify the undersigned if there are any additional fees due that have not been identified or included herewith.

It is now believed that the application is in condition for allowance and such allowance is respectfully requested.

Respectfully submitted,

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